

**U.S. DEPARTMENT OF ENERGY
IDAHO OPERATIONS OFFICE**



**IDAHO CLEANUP PROJECT
CONTRACT OVERSIGHT PLAN**

EXECUTIVE SUMMARY

The Idaho Cleanup Project (ICP) is a DOE Environmental Management Program responsible for managing a variety of radioactive and hazardous wastes at the Idaho Site that originated from numerous DOE missions at the Idaho Site and from other DOE facilities.

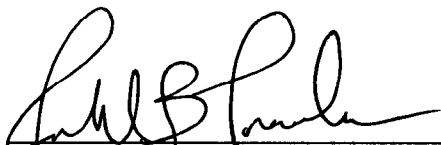
Central to NE-ID's administration of the ICP contract is the oversight and evaluation of the contractor's performance. In order to verify performance, a systematic process of assessment, evaluation, analysis, documentation and feedback will be required. NE-ID will work to ensure that the execution of all contract oversight activities are focused upon risk reduction and are tailored through the oversight planning process to support the safe accelerated cleanup of the site.

NE-ID intends to conduct oversight of the ICP based on the risk based oversight model that has been developed for use throughout NE-ID. Oversight will be based on the program structure of the ICP, taking into account the overall risks associated with each ICP project or function and adjusting oversight according to performance. The intent is to focus upon systems and outcomes within a broad set of guiding principles, performance metrics, and sound institutional controls that are verified by an effective self-assessment process.

This Oversight Plan has been prepared in accordance with Section H.3 of the ICP contract and is provided as a Government-furnished service to the ICP contractor in order to provide a management level overview of the process and approach NE-ID will apply in the conduct of oversight. This plan will be supplemented by a three-year schedule of assessments that will be maintained by NE-ID in accordance with the Special Contract Requirements.

NE-ID will use oversight results to help make informed, fact-based decisions regarding the adequacy of contractor performance, and to determine where NE-ID oversight activities may require adjustment.

Approved:



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IDAHO CLEANUP PROJECT CONTRACT OVERSIGHT PLAN

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I. INTRODUCTION

The Idaho Clean-up Project (ICP) is a DOE Environmental Management Program responsible for managing a variety of radioactive and hazardous wastes at the INEEL that originated from numerous DOE missions at the Idaho Site and from other DOE facilities. ICP is treating, storing and disposing a variety of waste streams, cleaning up the environment, removing or deactivating unneeded facilities and will remove DOE's inventory of spent nuclear fuel and high-level waste from Idaho.

NE-ID intends to conduct oversight of the ICP based on the risk based oversight model that has been developed for use throughout NE-ID. Oversight will be based on the program structure of the ICP, taking into account the overall risks associated with each ICP project or function and adjusting oversight according to performance. The intent is to focus upon systems and outcomes within a broad set of guiding principles, performance metrics, and sound institutional controls that are verified by an effective self-assessment process. While maintaining operational awareness, NE-ID will rely upon transactional oversight only to the extent necessary to validate data and verify the effectiveness of systems and assessment efforts.

NE-ID will work with contractors, regulators and stakeholders to streamline and expedite the Idaho Clean-up Project. NE-ID will work to ensure that contract oversight activities are focused upon risk reduction and are tailored to achieve the safe accelerated cleanup of the site. NE-ID is committed to provide the Government Furnished Services and Items included in Section H of the contract in a timely manner and to work with the contractor to achieve the goal of safe accelerated completion of the project under the target cost by the specified contract date.

II. PURPOSE

The major purposes of ICP oversight are to ensure conformance with contract requirements, ensure the adequacy of systems, improve the reliability and effectiveness of operations, and to evaluate performance.

This Oversight Plan has been prepared in accordance with Section H.3. of the ICP contract and is provided as a Government-furnished service to the ICP contractor in order to provide a management level overview of the process and approach NE-ID will apply in the conduct of oversight. This plan will be supplemented by a three-year schedule of assessments that will be maintained by NE-ID in accordance with the Special Contract Requirements. This initial plan may be updated as necessary within 60 days of approval of the ICP contractor's baseline submittal, Integrated Safety Management and project control systems and ES&H program. This plan will thereafter be updated annually based upon NE-ID assessments of project risk, evaluations of the effectiveness of contractor continuous improvement efforts and corrective actions, and demonstrated contract performance.

III. SCOPE

The scope of this oversight plan includes oversight activities conducted by, or on behalf of, NE-ID. The scope of NE-ID oversight of the ICP shall include all work performed within or funded

by the ICP, including work performed by NE-ID prime contractors, subcontractors, State and other Federal agencies, and by NE-ID, including other NE-ID direct contractors. This oversight will include all work conducted on behalf of the ICP as well as any work performed within the physical boundaries of ICP projects. Oversight includes ensuring conformance with requirements, conducting assessment activities, conducting performance measurement and evaluation, and evaluating self-assessment activities. The results of performance assessments will contribute to performance evaluations. The ICP Federal staff, NE-ID organizations outside of ICP, or independent organizations acting on behalf of NE-ID may conduct oversight.

Not included within the scope of this plan are those assessment or investigative activities conducted independently by organizations outside of NE-ID such as the DOE Office of Inspector General (OIG), DOE-Headquarters, the General Accounting Office (GAO), the Office of Management and Budget (OMB), etc. Oversight performed by organizations outside of NE-ID will be conducted in coordination with the CO and COR. NE-ID will make reasonable accommodations in oversight scheduling in the events of such independent activities in order to minimize the impact upon the ICP contractor.

For purposes of this plan, the term *oversight* is inclusive of all activities associated with ICP performance assurance including, but not limited to: assessment; audit; surveillance; performance evaluation; appraisal; self-assessment; walk-through; etc.

IV. RESPONSIBILITIES AND AUTHORITIES

Pursuant to the contract and under the authority of the Contracting Officer, NE-ID supports timely execution of the ICP with day-to-day project oversight, contract management, and rigorous adherence to and execution of a federal baseline.

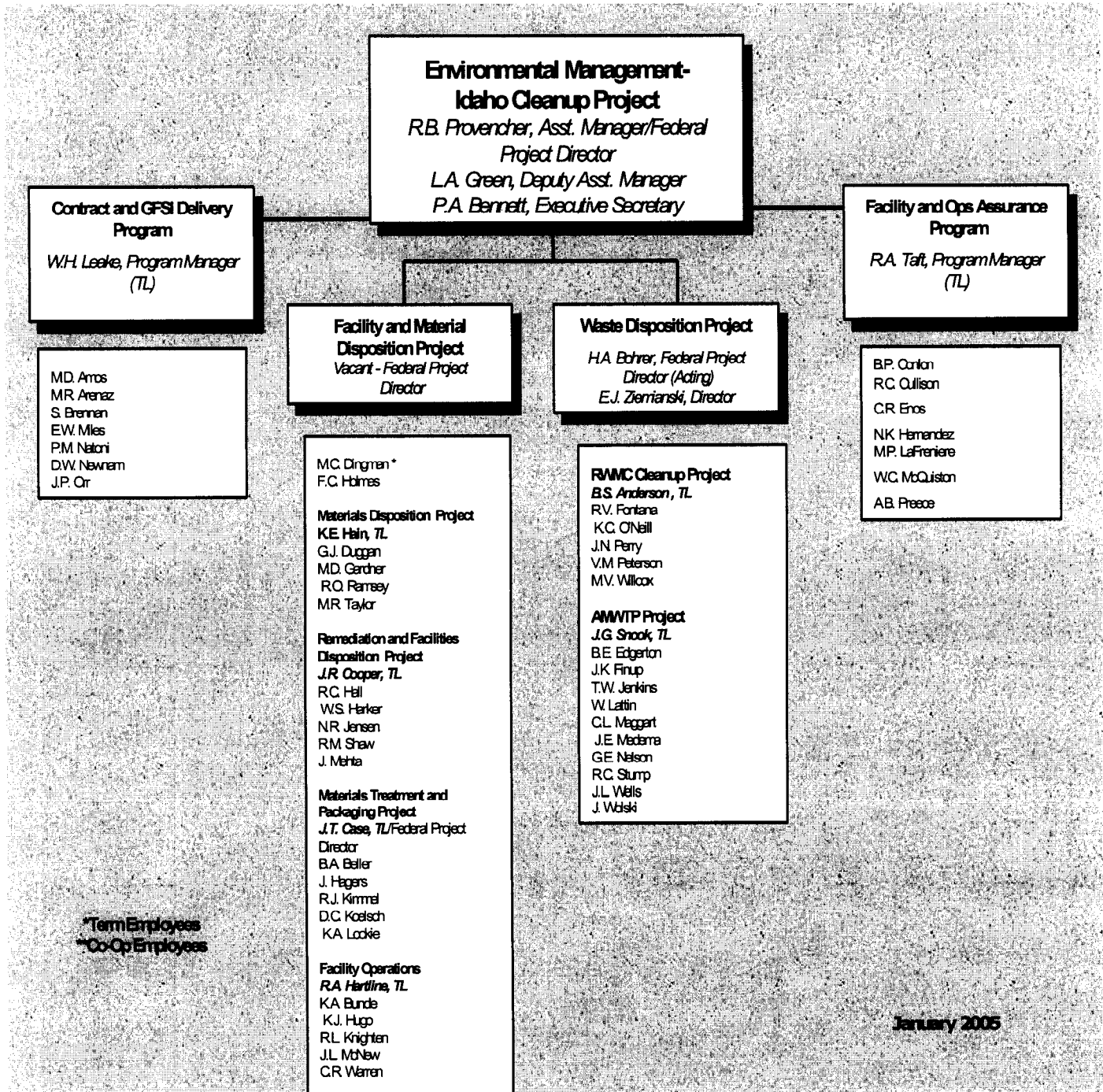
The ICP Assistant Manager, the Deputy Assistant Manager, Federal Project Directors, and Project Team Leaders will each expend 200 hours per year in the field performing operational awareness-related activities.

ICP Assistant Manager: Sets the oversight and performance expectations for the ICP and is the primary project manager and Contracting Officer's Representative with ultimate responsibility for timely execution of the ICP.

ICP Deputy Assistant Manager: Sets the goals and objectives for the oversight and performance expectations established by the ICP Deputy Manager.

Federal Project Directors: Implement the goals and objectives established by the ICP Assistant and Deputy Assistant Managers, ensure the conduct of day-to-day operational awareness, conduct performance measurement, assess and evaluate performance, and schedule and conduct NE-ID assessment activities within their assigned areas of ICP. The roles and responsibilities of Federal Project Directors are fully described in DOE Manual 413.3-1, Project Management for the Acquisition of Capital Assets. Federal Project Directors also ensure timely execution and closure of NE-ID work activities identified in the Federal baseline.

Figure.1 NE-ID Idaho Cleanup Project Organization



Contract and GFSI Delivery Program Manager: Manage and integrate the business, performance, communications, and regulatory systems needed to facilitate achievement of the ICP. This includes coordinating with other ICP divisions on the Accelerated Cleanup Performance Management Plan, Federal Baseline Schedule, Life-Cycle Baseline, Government Furnished Services and Items, Performance Metrics, Performance Based Incentives, Headquarters Reports, and External Communications.

Facility and Operations Assurance Program (F&OAP) Manager: Assure that the operational aspects of the Idaho Cleanup Project are executed in a safe, compliant and effective manner. FO&AP elements include development and implementation of the operational management systems needed to facilitate achievement of the EM Cleanup Mission with emphasis upon nuclear facility safety basis management. Specific program responsibilities include Federal oversight of contractor continuous improvement and corrective action efforts as well as technical oversight of Safety Significant Structures, Systems, and Components for the Idaho Cleanup Project Nuclear Facilities.

ICP Project Staff and assigned members of Integrated Project Teams: Monitor contractor performance in specific assigned areas of the project relative to the terms and conditions of the contract and regulatory requirements, and meet or exceed Federal baseline commitments. Integrated Project Teams are described in DOE M 413-3-1.

Subject Matter Experts: Assist in the monitoring of contractor performance and conduct assessments within their assigned area of expertise based upon the terms and conditions of the contract, regulatory requirements, documented trends of contractor performance, and areas of concern identified by the Facility Representatives.

Facility Representatives: Facility Representatives (FRs) serve as the on-site representatives of NE-ID Management and Federal Project Directors with regard to operational awareness activities. The FRs monitor operations to ensure facilities are operated safely, provide early identification of vulnerabilities, verify that the contractor is effectively controlling operations and conducting credible self-assessments, ensure that effective lines of communication exists, support any emergency response, etc.

Support Organizations: The Assistant Manager for Operational Support (AM/OS) and the Assistant Manager for Administration Services (AM/AS), although not ICP line management organizations, are responsible for carrying out oversight in three functional areas: 1) enforcement of radiological and nuclear safety violations under the Price-Anderson Amendment Act of 1988; 2) general policy, technical support, and regulatory issue oversight; and, 3) administrative, budget performance, and business-related oversight.

V. QUALIFICATIONS

NE-ID has an established program to implement the requirements of DOE Order 361.1A, Acquisition Career Development Program. This Order establishes training and certification requirements and career development programs under the Acquisition Career Development Program for the DOE acquisition workforce, including contracting, purchasing, personal

property management, program management, Contracting Officers and Contracting Officer Representatives.

NE-ID will rely upon the established Career Development Program and Technical Qualification Programs to ensure the training and technical qualifications of the NE-ID Federal staff authorized to conduct contract oversight. All NE-ID staff will be fully qualified to carry out their assigned duties and will be trained regarding the terms and conditions of the contract prior to conducting ICP oversight. Emphasis will be placed upon safe performance within cost and schedule, and the terms and conditions of the contract.

1. Federal Project Director

A project manager career development program is specified within DOE Order 361.1A. This order establishes a well-defined career path for Federal Project Directors that includes certification, minimum training and continuing education requirements, and project responsibilities that are commensurate with clearly defined qualifications. The ICP Assistant Manager, the Waste Disposition Project Director, the Material Disposition Project Director, and the Materials Treatment and Packaging Project Team Leader will be Federal Project Directors and are required to meet the certification requirements of DOE Order 361.1A.

2. ICP Facility Representative Program

NE-ID has a Facility Representative Program established in accordance with DOE Standard 1063-2000, Facility Representative Program.

3. Technical Qualification Program

All NE-ID technical staff (Project Directors, Facility Representatives, Integrated Project Team Members, and Subject Matter Experts) will meet the qualification standards established in the DOE Technical Qualification Program (TQP) for their respective subject matter expertise or technical discipline at the ICP sites.

VI. OVERSIGHT TECHNIQUES

NE-ID will use oversight results to help NE-ID make informed, fact-based decisions regarding the adequacy of contractor performance, and to determine where NE-ID oversight activities may require adjustment. NE-ID will utilize transactional reviews only to the extent necessary to verify of the adequacy of processes or functions to operate within established parameters. NE-ID will use the following techniques to conduct oversight:

1. Contractor Continuous Improvement and Corrective Action Activities

NE-ID will ensure the effectiveness and implementation of contractor continuous improvement and corrective action activities to address management effectiveness. This shall include considering factors such as: the sufficiency of emphasis; the frequency, breadth and depth of self-assessment; the degree of rigor applied; the involvement of line

management; the sufficiency of technical expertise applied; the number and nature of findings; and, the adequacy and effectiveness of corrective actions.

2. Compliance Review

NE-ID will assess the systems and processes specified in the ICP contract used for project management, cost management and accounting, ES&H and Integrated Safety Management. NE-ID will also affirm the adequacy of systems configuration management and data integrity.

3. Performance Metrics and Benchmarks

NE-ID will use performance metrics and benchmarks, including contractor trending information, for performance trending and improvement, and will use metrics in making management decisions. The Federal staff will perform analyses of the performance of the ICP contractor. Performance analyses will include: earned value analysis including trend analysis; critical path analysis; safety trending; and, contract analysis including Requests for Equitable Adjustment, Baseline Change Proposals, fee paid, fee available, penalties assessed, performance based incentive status, changes in key personnel, etc. Unless otherwise prescribed by the contract, NE-ID and the ICP contractor will review and mutually agree to the performance metrics that are used for contract performance evaluations.

4. DOE Assessment

Exclusive of operational awareness activities, *assessment* includes review, evaluation, inspection, test, check, surveillance, or audit, to determine and document whether items, processes, systems, or services meet specified requirements and perform effectively.¹ Assessments will be conducted by NE-ID organizations. These assessments may be based upon requirements, risks, past performance, or the effectiveness of contractor assessments, as well as “for cause” assessments. For cause reviews result from a determination that contractor performance assurance is ineffective in identifying and resolving problems or that performance trends and events may result in unfavorable consequences. The contractor should be afforded an opportunity to provide a factual accuracy review of findings. The CO/COR will convey the assessment results to the contractor for timely resolution. NE-ID will verify the effectiveness of the contractor’s corrective actions. Some NE-ID assessments may be conducted jointly between NE-ID and the contractor, or independent organizations, at the discretion of the NE-ID Manager or ICP Assistant Manager.

5. Independent Assessment

Assessments may be conducted by DOE organizations outside of NE-ID or by individuals and organizations recognized by DOE to have a particular expertise. These assessments may include those planned based upon requirements, risks, past performance, and the effectiveness of contractor assessments, as well as “for cause” reviews. Independent assessments may also result from DOE-HQ or DNFSB direction. The contractor should be

¹ DOE Order 414.1B

afforded an opportunity to provide a factual accuracy review of findings. Independent assessment results will be documented and provided to the contractor through the CO/COR for timely resolution and NE-ID will verify the effectiveness of corrective actions. Independent assessment activities will typically be conducted only upon high risk or sensitive areas. At the discretion of the NE-ID Manager or ICP Assistant Manager, some independent assessments may be conducted jointly between NE-ID, the contractor and the independent organization.

6. Operations Awareness

Consistent with Environmental Management's 4.0 Safety Program and policy of a Zero Accident Workplace, NE-ID will maintain operations awareness to ensure facilities are operated safely and within the safety basis, provide early identification of vulnerabilities, verify that the contractor is effectively controlling operations and conducting credible self-assessments, ensure that effective lines of communication exist, and support any emergency response. NE-ID will routinely monitor work performance through direct observation, walk-through, document reviews, meeting attendance and daily interaction in the field. The contractor should be afforded an opportunity to provide a factual accuracy review of findings. The results of NE-ID operations awareness activities, including findings and concerns, will be documented and will be forwarded to the CO/COR by the Federal Project Directors for transmittal to the contractor on a monthly basis.

In order to ensure the awareness of the full scope of activities, NE-ID intends that operations awareness activities range widely across the scope of the ICP and are not confined or limited by risk. Facility Representatives will be expected to frequently observe low risk, industrial activities as well as activities performed by State and other Federal agencies, and other NE-ID direct contractors as part of normal operations awareness activities.

Operations awareness also extends to program and project management activities. NE-ID staff assigned to program and project management will be expected to maintain a current awareness of status, conditions and issues that may affect accelerated clean-up milestones, legally enforceable milestones, EM performance expectations and measures, and contract deliverables or requirements. NE-ID will maintain program and project awareness and routinely monitor performance through analysis of performance measures, document reviews, cost/schedule and budget review and analysis, meeting attendance and regular interaction with the contractor.

NE-ID will rigorously review and trend performance data used in project and ES&H management, and will review and evaluate events and issues that are required to be reported. NE-ID Management will include Facility Representatives and others, as appropriate, in field oversight to enhance communications and ensure prompt response to issues. Operations awareness activities will be documented.

VII. CONTRACTOR PERFORMANCE EVALUATION

Central to NE-ID's administration of the ICP contract is the oversight and evaluation of the contractor's performance. In order to verify performance, a systematic process of assessment, evaluation, analysis, documentation and feedback will be required. Oversight will be formally documented by the performing organization and will be utilized by NE-ID to evaluate contract performance. The NE-ID staff will fully understand the terms and conditions of the contract and will review and evaluate the baseline and quality of deliverables stated in the contract. NE-ID will use the range of oversight techniques identified above, tailored to complexity and risk, in the areas described below. The initial ICP risk-based oversight strategy is included in Attachment 1. Typical oversight frequencies are presented in Attachment 2.

1. Project Management

This includes operations awareness and the monthly and quarterly assessment of project status, which will be used to determine and validate project performance. The qualification of NE-ID employees conducting this oversight is described in Section H.3(c) of the ICP contract. Project Management Oversight will be conducted in accordance with Section H of the contract.

The Waste Disposition Project Director, the Material Disposition Project Director, and the Materials Treatment and Packaging Project Team Leader, acting as Federal Project Directors, are fully accountable for project performance within the established scope, schedule, technical and contractual requirements of the project. These Federal Project Directors are also responsible for ensuring timely and fully compliant execution and completion of Federal actions. The Federal Project Directors will conduct routine field inspections and document any concerns to the CO/COR. These field inspections will be conducted to verify and validate that work is being accomplished as reported. Federal Project Directors are not Contracting Officer's representatives and, therefore, do not have the authority to direct the contractor or to take any action that will affect scope, schedule or cost of the contract.

Federal Project Directors will review the monthly and semi-annual status reports and will validate project performance. Results of these reviews will be provided to the CO and COR.

2. Contract Management

The CO will administer and monitor the prime contract(s) in accordance with the contract terms and conditions which include, but are not limited to, the oversight required under Federal Acquisition Regulation (FAR) Subchapter G – Contract Management (FAR Parts 42 – 51) and its supplements. Interactions with the CO can be expected on a daily basis. The CO will maintain a list of contract modifications and will manage the process for Requests for Equitable Adjustments (REAs) or any other contractual changes that may be required during the life of the contract.

3. Cleanup

In addition to the oversight provided by PMs and FRs stated above, Subject Matter Experts (SMEs) may conduct oversight of cleanup activities in accordance with the three-year

schedule of assessments and when requested by line management or the Contracting Officer. The primary focus will be on the major physical work activities stated in the contract.

The NE-ID staff will be trained and qualified in the respective area of cleanup work responsibility and shall have unencumbered access to facilities and available information. The staff will use facility visits to assess compliance with the terms and conditions of the contract. All NE-ID personnel have the right to stop any activity, if continuation of that activity would either be considered an imminent danger situation or have a negative impact on the environment, safety or health of the site, the workers or the public. NE-ID staff will document any identified issues or concerns, afford the contractor an opportunity to provide a factual accuracy review, and submit the issues or concerns to the CO and COR for consideration.

An imminent danger situation exists when any condition or practice could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through enforcement procedures.

A negative impact on the environment, safety or health of site workers or the public includes situations that result in unplanned releases to the environment, uncontrolled exposures to workers or the public, or programmatic failures that could result in these situations.

In addition to this interaction, the contractor is expected to support NE-ID Management walk-throughs, tours of buildings, ICP project areas, Potential Release Sites that have been deemed as response actions, and periodic walk-throughs by regulators, stakeholders, the Defense Nuclear Facility Safety Board, or DOE Headquarters personnel.

4. Financial Management

NE-ID will review budgetary data submitted by the contractor to be provided into the Integrated Planning, Accountability, and Budgeting System (IPABS) or other agency authorized budget system. NE-ID will review the status of designated Idaho management commitments. NE-ID will monitor and audit contractor financial management systems and funds management practices and procedures to ensure compliance with applicable regulations and statutes.

As specified in the contract, NE-ID will review all budgetary data submitted by the contractor to be provided into the Integrated Planning Accountability and Budget System (IPABS). Budget formulation and execution is an integral part of project management and oversight of the contract. NE-ID will monitor and audit the contractor's funds management practices and procedures to ensure compliance with the terms and conditions of the contract. Financial reviews of the internal controls programs are independent of the project management. The financial reviews will be conducted by NE-ID on a routine basis and will be included in the 3-year schedule of assessments to be maintained on the Idaho Operations Office Website pursuant to Clause H.3. of the ICP contract. NE-ID may conduct a limited

number of unscheduled financial assessments during the year, generally not to exceed three major assessments annually.

The NE-ID AM/AS will provide accounting, budget and financial support. Teams of financial and technical personnel will reconcile the contractor's cost management reports with vouchers and invoices; investigate problems; review post-retirement benefits and pension information, financial statements and disclosure; provide budget guidance; coordinate independent audit agency activities and book entries into financial statements.

5. External Oversight/Interfaces

NE-ID maintains frequent interactions between various DOE organizational elements, Federal and State of Idaho regulatory agencies, the Defense Nuclear Facilities Safety Board, and local stakeholders. On occasion, these organizations may conduct oversight visits of operations. Oversight performed by organizations outside of NE-ID will be conducted in coordination with the CO and COR. NE-ID will make reasonable accommodations in oversight scheduling in the events of such independent activities in order to minimize the impact upon the ICP contractor.

6. Scheduled Assessment

NE-ID assessments of contractor activities identified during the oversight planning process will be compiled into a 3-year schedule to be maintained on the Idaho Operations Office Website pursuant to Clause H.3. of the ICP contract. Adjustments will be made no fewer than 30 days prior to any planned assessment (with the exception of a "For Cause" review.) Specific assessment details will be provided 30 days in advance to the contractor by the CO/COR. The contractor should be afforded an opportunity to provide a factual accuracy review of findings prior to issuing a final report. Assessment reports will be formally transmitted to the contractor by the CO/COR for development of a corrective action plan, if required. Excluding operational awareness activities and readiness reviews such as ORR's and RA's, NE-ID will attempt to limit the number of assessments to no more than six in any fiscal quarter unless coordinated and accepted in advance as part of the annual oversight schedule or as required by "for cause reviews." NE-ID will verify and validate the contractor's effectiveness in identifying and correcting the root cause of the concerns and findings.

7. ICP/INL Contract Interfaces

As specified in the contracts, the INL contractor will provide specific site services to the ICP contractor and the ICP contractor may provide services to the INL contractor. The ICP and INL contractors will develop agreements detailing interfaces on cross-cutting issues, regulatory compliance, and other matters of mutual benefit or compliance. The specified plans and agreements shall be provided to the CO for approval and NE-ID will monitor conformance to ensure safety, mutual cooperation, and effectiveness.

VIII. OVERSIGHT PROCESS

The ICP oversight process consists of three major aspects: oversight planning, oversight execution, and the evaluation of oversight results.

1. Oversight Planning

This plan and the three-year oversight schedule will be updated annually based upon NE-ID assessments of project risk, evaluations of the effectiveness of contractor continuous improvement efforts and corrective actions, and demonstrated contract performance.

ICP oversight planning will be conducted in a manner consistent with the NE-ID contract oversight process and in accordance with Chapter 4 of the AM/EM Manual. Elements of the ICP and systems that support the ICP will be assessed to determine risks, consequences and probability of occurrence. The Contracting Officer, ICP Assistant Manager, ICP Deputy Assistant Manager, ICP Team Leaders and Federal Project Directors will use the results of these processes, as well as other factors such as contractor self-assessment effectiveness and contract performance as well as process or project knowledge, to identify lines of oversight, oversight techniques and oversight frequencies. The current ICP risk evaluation and oversight strategy is included in Attachment 1. Oversight techniques are discussed in Section V. Typical oversight frequencies are presented in Attachment 2.

ICP Team Leaders and Federal Project Directors will compile the results of oversight planning into an ICP oversight schedule. The ICP Assistant Manager shall approve the oversight schedule as an integral part of the EM Federal Baseline Process. Performance relative to oversight schedules shall also be addressed as part of the Federal Baseline status update, and the ICP Assistant Manager shall review schedule performance on a regular basis with the ICP Project Directors.

Assessments of contractor activities identified in the ICP oversight planning process shall be integrated with assessments identified by AM/OS and AM/AS. Consideration will also be given to DOE Headquarters direction and complex-wide events in establishing the scope of oversight. The results will be compiled into the three-year schedule to be maintained on the Idaho Operations Office Website. This schedule will represent all planned assessments of the ICP contract and will be established by the Contracting Officer.

ICP contract performance measures and deliverables shall be in accordance with the ICP contract or as directed by the Manager or Contracting Officer. Measures of NE-ID ICP performance shall be at the direction of the NE-ID ICP Directors, AM/OS and AM/AS.

2. Oversight Execution.

NE-ID will work to ensure that the execution of all contract oversight activities are focused upon risk reduction and are tailored through the oversight planning process to support the safe accelerated cleanup of the site. NE-ID will rely upon transactional oversight only to the extent necessary to validate data and to verify the effectiveness of the contractor systems and of self-assessment efforts. NE-ID oversight will be primarily directed towards ensuring that

contractor systems meet requirements and that these systems are complied with in execution. NE-ID will verify the contractor's effectiveness in correcting the root cause and causal factors of concerns and findings.

NE-ID intends that the operations awareness activities conducted by the Federal staff shall range widely across the scope of the ICP and shall not be confined to only high-risk areas or activities. NE-ID will maintain operations awareness sufficient to assure conformance with requirements and good safety practices across the entire scope of the ICP regardless of performer.

Oversight shall be conducted according to the Federal Baseline Schedule and will be executed in accordance with Chapter 4 of the AM/EM Manual. Oversight results shall be formally documented and the results shall be entered into the Operations Information Management System (OIMS) for tracking and trending purposes. The contractor should be provided an opportunity to provide a factual accuracy review of oversight results. Formally documented oversight results shall be transmitted to the contractor for information and corrective action through the CO/COR.

3. Evaluation of Oversight of Results

The major purposes of ICP oversight are to ensure conformance with contract requirements, ensure the adequacy of systems, improve the reliability and effectiveness of operations, and to evaluate performance. NE-ID will use oversight results to make informed, fact-based decisions regarding the adequacy of contractor performance, and to determine where NE-ID oversight activities may require adjustment. Oversight results will contribute to performance evaluations.

The Contract and GFSI Delivery Team will maintain the Federal Baseline Schedule. ICP Team Leaders and Federal Project Directors are responsible for analyzing trends and will review contractor performance and oversight results on a regularly scheduled basis with the ICP Assistant Manager. Issues relating to contract performance will be resolved through the CO/COR.

Consistent with Chapter 4 of the AM/EM Manual, ICP will conduct a quarterly oversight scheduling meeting with AM/OS and AM/AS to evaluate oversight results, performance trends, issues, DOE Headquarters direction and complex-wide events. NE-ID will also evaluate the effectiveness of contractor self-assessment activities and corrective actions. The NE-ID oversight effort will be redirected according to performance and needs, and the oversight schedule will be revised accordingly. Issues relating to contract performance will be resolved through the CO/COR.

NE-ID will perform at least annual self-assessments of NE-ID conformance to this plan and other Federal work requirements in accordance with ID Manual 120.A to identify positive and negative attributes and to adjust performance to ensure continuous improvement.

ICP OVERSIGHT STRATEGY

The overall ICP risk level is considered Moderate². Risks to the ICP fall into two main categories, Project Management and Safety.

1. Project Management

Project management risks are associated with contractor failures of delivery or of performance that could result in a failure to achieve EM Accelerated Cleanup objectives and or regulatory requirements, such as the Settlement Agreement. The consequences of these failures could affect DOE and INL strategic objectives, the future capabilities of the laboratory, and adversely affect stakeholder perceptions of the laboratory and the Department. The project management oversight strategy will be to ensure the reliability of contractor management systems to provide timely and accurate information relative to performance. This will be accomplished through: selective assessments to establish system conformity to contract requirements; the use of performance measures and analysis of data to demonstrate performance relative to cost, schedule and programmatic objectives; operational awareness to ensure conformity to system requirements and to maintain awareness of technical issues affecting performance and deliveries; and, for-cause reviews in cases of significant difficulty affecting contract performance. Specific assessment areas include compliance reviews and follow-on reviews of the project management system, audits of costs and of the systems of cost control and estimating, and reviews of the life cycle baseline. These assessments will involve AM/AS and may involve DOE HQ. Independent organizations such as DCAA may participate in audits of cost and estimates. NE-ID will rely upon the performance measures stated in the contract, including the Key Performance Measures stated in Section L-9, and the project management measures described in Section H-1 of the ICP contract.

2. Safety

Safety risks are associated with Nuclear Safety and Industrial Safety that result from failures to provide and maintain adequate barriers or to detect failures of the barriers. The immediate consequences of a barrier failure could be life threatening or disabling injuries to workers, excessive worker exposures, or possible uncontained releases at or beyond the site boundary involving the public. The consequences of such events could affect DOE and INL strategic objectives, the future capabilities of the laboratory, and adversely affect stakeholder perceptions of the laboratory and the Department. Consistent with Environmental Management's 4.0 Safety Program and Zero Accident Workplace Policy, the oversight

² Risk levels are described in the NE-ID Contract Oversight Model. A moderate risk indicates that an unfavorable consequence could occur within the mission or plant lifetime or on a less than 20-year interval.

strategy will be to ensure the reliability of contractor Integrated Safety Management and ES&H systems to provide timely and accurate information relative to conditions and performance. This will be accomplished through selective assessments to establish system conformity to requirements, the use of performance measures and analysis of data to demonstrate assurance system performance, operational awareness, and for-cause reviews in cases of significant difficulty affecting performance. A strong emphasis upon operational awareness will be maintained through the Facility Representative Program and through frequent management time in the field. Specific assessment areas include: compliance reviews and follow-on audit and surveillance of the Integrated Safety Management System (ISMS) and Environmental Safety and Health Program; audit and surveillance of conduct of operations; audit and surveillance of quality assurance; audit and surveillance of environmental permit conformance; audit and surveillance of nuclear safety; and, surveillances of the INL/ICP contractor interfaces. These assessments may involve AM/OS, DOE-HQ or independent organization participation. NE-ID will rely upon the performance measures directed by the CO/COR.

ICP RISK EVALUATION			
Oversight Area	ICP WBS	Risk	Comments
RWMC Operations	1.2.6, 1.2.9 1.2.10	Moderate	Highest risks are Radiological and Industrial safety associated with operations.
AMWTP Program	1.2.4, 1.2.5 1.2.13	High	Highest risks are programmatic, including potential for missing Settlement agreement milestones as well as non-compliance to WIPP requirements impacting WIPP ability to receive waste. Worker health and safety are also high risk.
WAG 7 Program	1.2.7, 1.2.8	Moderate	Highest risk is worker health and safety as well as environmental protection. Programmatic risk associated with implementation of agency agreed to path forward on WAG 7.
LLW Program	1.2.1	Moderate	Highest risk is programmatic in meeting performance goals, and maintaining off-site disposal capability.
RH TRU Program	1.2.3	Moderate	Highest risk is worker health and safety during waste retrieval

ICP RISK EVALUATION			
Oversight Area	ICP WBS	Risk	Comments
			activities. Programmatic risk associated with implementation and compliance to WIPP requirements will also become significant.
MLLW Program	1.2.2	Moderate	Highest risk is programmatic in maintaining compliance to off-site disposal requirement in order to ensure continued availability of off-site disposal paths. Worker health and safety and also a consideration.
Spent Nuclear Fuel (INTEC SP1)	1.1.1	Moderate	Highest risk was worker industrial safety for fuel and cask handling.
Special Nuclear Material (INTEC SP2)	1.1.2	Moderate	Highest risk is programmatic related to very aggressive acceleration.
High Level Waste (INTEC SP3, 4 and 5)	1.1.4	High	Risk value 10,000 is for missing Gold Chart goals due to WIR litigation. This element needs to be reevaluated once a path forward is determined. The ongoing fieldwork for tank cleaning is a moderate ES&H risk and oversight activities were based on that.
D&D/VCO (INTEC SP6, 7)	1.1.5	Moderate	Highest risk was worker industrial safety for D&D heavy equipment operations.
ER (INTEC SP6)	1.1.6	Moderate	Highest risk was worker industrial safety for heavy equipment operations.
INTEC Waste Management (Eliminate Mixed Low Level Waste Backlog/Services)	1.1.7	Moderate	Highest risk is worker industrial safety related to handling large waste boxes. This element is for the INTEC operation of CPP-1617 and MLLW sorting and filter leach operations in NWCF. WMD handles the program management.
Facility Ops/Utilities (INTEC SP0)	1.1.8	Moderate	The highest risk was for worker industrial safety associated with high voltage and steam systems.

ICP RISK EVALUATION			
Oversight Area	ICP WBS	Risk	Comments
Facility Ops/Utilities (INTEC SP0)	1.1.9	Low	Programmatic risks are associated with impacts on the repository LA.
TAN (Clean/Close TAN all Subprojects)	1.3	Moderate	Highest risk was worker industrial safety for D&D heavy equipment operations.
PBF/ARA (CLN PBF SP1)	1.4.1	Moderate	Highest risk was worker industrial safety for D&D heavy equipment operations or handling heavy awkward wastes and containers.
TRA (CLN TRA SP1)	1.4.2	Moderate	Highest risk was worker industrial safety for D&D heavy equipment operations.
Site Wide Monitoring (CLN SW SP1 and SMLTO SP3)	1.4.3	Low	Mostly programmatic risk but some worker safety risk for sampling equipment operation and off-road vehicle operation.
Packaging and Transportation (CC-SP4)	1.9.4	Low	Mostly programmatic risk due to potential weather impact to shipment schedules. ES&H risks were evaluated in project elements that prepare, load and transport shipments.
Operations Oversight	1.9.1	Moderate	The major ICP risk is from a failure of the contractor ISM or ES&H in the area of worker protection (industrial safety).
ICP Contract Oversight	1.9.1.3	Moderate	The major ICP risk would be from a failure of the contractor project control system to detect and correct significant cost and schedule performance issues that could result in the inability to achieve regulatory compliance or EM Accelerated Cleanup Plan objectives.

Attachment 2.
Typical Oversight Frequencies.

Oversight Technique	Risk - High	Risk - Moderate	Risk - Low
Contractor Self Assessment	Frequent	Frequent	Frequent
Compliance Review (including joint systems reviews)	Frequent	Occasional – As specified by the contract.	Seldom
Performance Metrics	Frequent	Frequent	Frequent
NE-ID Assessment	Frequent	Occasional – As determined or for cause	Seldom – For cause
Independent Assessment	Frequent	Occasional – As determined or for cause	Seldom – For cause
Operations Awareness	Frequent	Frequent	Frequent